



Hamilton Sundstrand

A United Technologies Company

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► **EPA Region 7 Air and Waste Management**

901 N. 5th Street
Kansas City, KS 66101-2907

According to guidance received and contained within 40 CFR 63 Subpart ZZZZ as well as the reporting form for the State of Nebraska, it is our interpretation these regulations specify no requirements for our operation. Our facility has only one Reciprocating Internal Combustion Engine (RICE) that has the potential to be regulated under ZZZZ. This RICE is a Natural Gas fired Ford Model L86-8751-6005D Spark Ignition Engine. According to the specifications this is a 7.5 L V8 engine which generates 148 HP at 2800 RPM operating speed. This engine is used to power a Katolight 85 KW generator solely for use as emergency power if regular electrical load is disrupted.

Hamilton Sundstrand's reporting status for air emissions is no permit required due to negligible air emissions generated at this facility.

In discussion with peers in Nebraska, there appears to be some ambiguity on which facilities do and do not need to submit initial notification to meet Subpart ZZZZ requirements. Due to this ambiguity HS York is submitting initial notification to guarantee we meet the initial reporting requirements of 40 CFR 63 Subpart ZZZZ.

Respectfully,

David A. McWilliams MS, CHMM, ASP

EH&S Manager
Hamilton Sundstrand Aerospace
8/30/2010

enclosure



NEBRASKA DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Quality Division

INITIAL NOTIFICATION FORM

Applicable Rule: 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) - Promulgated 6/15/04, 1/18/08, & 3/3/10

Company Name Hamilton Sundstrand Aerospace

Facility ID# 47643

Owner/Operator/Title Plant Manager

Mailing Address 2800 Division Avenue

City York Nebraska

Zip 68467

Plant Address (if different than owner/operator's mailing address):

Street _____

City _____

Zip _____

Plant Phone Number (402) 362-8226

Plant Contact/Title David A. McWilliams, EH&S Manager

This form must be completed, signed and submitted to the following agencies:

NDEQ Air Quality Division
1200 'N' St. Atrium, Suite 400
Lincoln, NE 68509-8922

and

Region VII EPA – Air & Waste Management
901 N. 5th Street
Kansas City, KS 66101-2907

If your facility is located in Omaha or Lancaster County, you must submit a notification to the appropriate air pollution control agency in that area and Region VII EPA.

Provide the following information for the applicable stationary engine(s). Add additional tables or rows as needed.

Unit #	Engine Startup Date	Site Rating Brake Horsepower	Displacement (liters/cylinder)	Fuel(s) Combusted	Compression Ignition	Spark Ignition	Emergency	Limited Use
01	1/1982	148	7.5 L	Nat. Gas	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input checked="" type="checkbox"/> YES	<input checked="" type="checkbox"/> YES
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES

Unit #	Engine Startup Date	Site Rating Brake Horsepower	Displacement (liters/cylinder)	Fuel(s) Combusted	Compression Ignition	Spark Ignition	Emergency	Limited Use
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES

Source Classification - Check the box that applies:

- ☐ Facility is a major source of hazardous air pollutants (HAPs).*
- ☒ Facility is an area source of HAPs.*

*Note: A major source is a facility that has a potential to emit greater than 10 tons per year of any single HAP or 25 tons per year of all HAPs combined. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line.

Is the engine(s) a new/reconstructed emergency or limited use engine and > 500 horsepower located at a major source of HAP ? ☐ Yes ☒ No

If YES, the engine(s) does not have any additional requirements under Subpart ZZZZ, but you must meet the requirements of 40 CFR Part 60 New Source Performance Standards Subpart IIII for Compression Ignition Engines or Subpart JJJJ for Spark Ignition Engines .

Source Type - Check the box that applies:

- ☐ New Source*
- ☒ Existing source*

*Note: To determine if you are a new or existing source, see the attached information following this form.

Print or type the name and title of the Responsible Official for the facility:

Name: David Rollyson

Title: Plant Manager

A Responsible Official can be:

- The president, vice president, secretary, or treasurer of the company that owns the plant;
- An owner of the plant;
- A plant engineer or supervisor of the plant;
- A government official, if the plant is owned by the Federal, State, City, or County government; or
- A ranking military officer, if the plant is located at a military base.

I CERTIFY THAT INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

David Rollyson
(Signature of Responsible Official)

9/30/10
(Date)

NESHAP Subpart ZZZZ Initial Notification Form Information

Who needs to complete and submit this form?

Sources with the following stationary engines are subject to the initial notification requirements:

1. Existing non-emergency compression ignition engines > 100 and ≤ 500 horsepower (HP) at major sources of HAP;
2. Existing non-emergency compression ignition engines > 300 HP at area sources of HAP;
3. All non-emergency engines > 500 HP at major sources of HAP;
4. New or reconstructed emergency and limited use engines > 500 HP at major sources of HAP; and
5. New or reconstructed non-emergency four-stroke lean burn engines ≥ 250 HP at major sources of HAP.

Who does not need to complete and submit this form?

Sources with the following stationary engines do not have to meet the initial notification requirements:

1. Existing compression ignition <100 HP;
2. Existing emergency compression ignition engines¹;
3. Existing compression ignition engines not subject to any numerical emission standards;
4. New or reconstructed engines subject to the New Source Performance Requirements under 40 CFR Part 60 (except for the new or reconstructed engines listed in the previous section); and
5. Sources not subject to the requirements in 40 CFR Subpart ZZZZ (see list below).

How do I know if I am an existing or a new source?

You are an existing source under NESHAP Subpart ZZZZ if your engine is:

1. >500 horsepower at a major source of HAP and installed or built on-site before 12/19/02; or
2. ≤500 horsepower at a major source of HAP and installed or built on-site before 6/12/06; or
3. At an area source of HAP and installed or built on-site before 6/12/06.

You are a new or reconstructed source if the engine was installed, built on-site, or reconstructed on or after the above dates. A change in ownership of an existing engine doesn't make it new.

When do I need to submit the initial notification?

The initial notification submittal deadline depends on your source type, classification, and startup date (for new sources).

1. Existing, spark ignition four-stroke rich burn (4SRB) and new or reconstructed >500 HP at major sources of HAP
 - a. Startup before 8/16/04; notification was due 12/13/04.
 - b. Startup on or after 8/16/04; notification is due 120 days after becoming subject to the rule.
2. New or reconstructed ≤ 500 HP at major sources of HAP
 - a. Startup before 3/18/08; notification was due 7/16/08.
 - b. Startup on or after 3/18/08; notification is due 120 days after becoming subject to the rule.
3. Existing sources at major and area sources of HAP
 - a. Due 8/31/10 or within 120 days after becoming subject to the rule.

When do I have to comply with Subpart ZZZZ?

1. Existing spark ignition 4SRB > 500 HP at a major source of HAP must be in compliance by 6/15/07.
2. New or reconstructed sources > 500 HP at major sources of HAP
 - Started up before 8/16/04 must be in compliance by 8/16/04.

¹ An emergency engine's operation is limited to emergency situations and required testing and maintenance. See the rule definition at § 63.6675 for more detail.

- Started up after 8/16/04 must be in compliance upon startup.
- 3. New or reconstructed sources ≤ 500 HP at major sources of HAP and new or reconstructed sources at area sources of HAP
 - Started up before 1/18/08 must be in compliance by 1/18/08
 - Started up after 1/18/08 must be in compliance upon startup.
- 4. Existing non-emergency compression ignition > 500 HP at a major source of HAP, existing ≤ 500 HP at a major source of HAP, and existing compression ignition at an area source of HAP must be in compliance by 5/3/13.
- 5. Area sources that become major sources of HAP
 - Engines installed or built on-site after the date the area source becomes a major source must comply upon startup of the engine.
 - Engines installed or built on-site before the date the area source becomes a major source must comply within three years of becoming a major source.

Who is not subject to the requirements in Subpart ZZZZ?

The following existing sources are not currently subject to the requirements in 40 CFR Part 63 Subpart A or Subpart ZZZZ:

1. Spark ignition 4SRB at an area source of HAP;
2. Spark ignition 4SRB ≤ 500 HP at a major source of HAP;
3. Spark ignition two-stroke lean burn;
4. Spark ignition four-stroke lean burn;
5. Emergency or limited use² > 500 HP at major source of HAP;
6. Spark ignition emergency or limited use;
7. Combusting landfill gas or digester gas equivalent to 10% or more of the gross heat input on an annual basis; and
8. Emergency residential, commercial, or institutional at an area source of HAP.

Where can I find more information about the requirements for Subpart ZZZZ?

You can find more information about Subpart ZZZZ, including federal register notices, brochures, and implementation tools, by going to the NDEQ website at www.deq.state.ne.us. Select "Focus on Air," then "Air Toxics Program," then under the "Air Toxics Notebook" select the link for Subpart ZZZZ. You can also find it at this direct link: <http://www.deq.state.ne.us/AirToxic.nsf/pages/ZZZZ>. You can also contact the Air Toxics Coordinator at (402) 471-2189.

² Limited use means any stationary engine that operates less than 100 hours per year.